

1  
2  
3  
4  
5

6 Hon. Ricardo S. Martinez

7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA, )  
11 v. Plaintiff, ) NO. CR 05-346 RSM  
12 ELIZABETH ANGOUS, ) STIPULATION AND ORDER  
13 Defendant. ) TO CONTINUE TRIAL DATE  
14 \_\_\_\_\_)

15 It is stipulated by and between the United States of  
16 America, by Assistant United States Attorney Susan Harrison,  
17 and defendant Elizabeth Angous, by her attorney Ralph Hurvitz,  
18 that trial in this case may be continued from November 28,  
19 2005 to March 27, 2006, with a new motions cut off date of  
March 2, 2006.

20 A superseding indictment was recently returned against  
21 Ms. Angous charging thirty three counts of bank fraud, four  
22 counts of wire fraud, one count of fraud in relation to access  
23 devices, one count of misuse of the social security number of

24  
25 RALPH HURVITZ  
ATTORNEY  
1420 FIFTH AVENUE, SUITE 3150  
SEATTLE, WA 98101  
206.223.1747  
26

1 another, and three counts of aggravated identity theft.  
2 Counsel was recently appointed to substitute for Jennifer  
3 Horwitz as counsel for Ms. Angous. Counsel requires  
4 additional time in order to familiarize himself with the  
5 extensive discovery material in this case. It may be possible  
6 that with additional time, Ms. Angous may resolve her case  
7 short of litigation of pretrial motions and trial.

8 The parties stipulate that the ends of justice served by  
9 continuing the trial date outweigh any interests of the public  
10 or of the defendant in a speedy trial as per 18 U.S.C.  
11 §3161(c)(1). Ms. Angous has discussed her right to a speedy  
12 trial with counsel, and will file a waiver of speedy trial  
13 through April 1, 2006.

14 Dated this 16<sup>th</sup> day of November, 2005.

15 s/Ralph Hurvitz  
16 RALPH HURVITZ  
17 Attorney for Defendant  
18 WSBA 7365  
19 1420 Fifth Avenue  
20 Suite 3150  
21 Seattle WA 98101  
22 Tel: 206.223.1747  
23 Fax: 206.467.1823  
24 E-mail: ralph@hurvitz.com

25 s/Susan Harrison  
26 SUSAN HARRISON  
Assistant United States Attorney  
700 Stewart Street  
Suite 5220

27 STIPULATION AND ORDER-2

28 RALPH HURVITZ  
29 ATTORNEY  
30 1420 FIFTH AVENUE, SUITE 3150  
31 SEATTLE, WA 98101  
32 206.223.1747

1 Seattle WA 98101  
2 Tel: 206.553.7970  
3 Fax: 206.553.2502  
E-mail: [sue.harrison@usdoj.gov](mailto:sue.harrison@usdoj.gov)

4 ORDER

5 The court has considered the stipulation of the parties  
6 concerning a continuance of the trial date in this case. The  
7 court finds that the ends of justice served by continuing the  
8 trial date outweigh any interests of the public or of the  
9 defendants in a speedy trial as per 18 U.S.C. §3161(c)(1).

10 Trial in this case is hereby continued to March 27, 2006.  
11 The new motions cut off date is March 2, 2006.

12 Dated this 18th day of November, 2005.

13  
14   
15 RICARDO S. MARTINEZ  
16 UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

RALPH HURVITZ  
ATTORNEY  
1420 FIFTH AVENUE, SUITE 3150  
SEATTLE, WA 98101  
206.223.1747

1 STIPULATION AND ORDER-3  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

RALPH HURVITZ  
ATTORNEY  
1420 FIFTH AVENUE, SUITE 3150  
SEATTLE, WA 98101  
206.223.1747